

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

GALLATIN RIVER COMMUNICATIONS)
L.L.C. D/B/A CENTURYLINK)

Petition for Arbitration Pursuant to)
Section 252(b) of the Communications Act)
of 1934, as amended by the)
Telecommunications Act of 1996)
To Establish the Rates, Terms and)
Conditions of Interconnection with)
NTS Services Corp.)

Docket No. 11-0567

**GALLATIN RIVER COMMUNICATIONS L.L.C D/B/A CENTURYLINK'S
MOTION TO STRIKE ISSUES RAISED IN NTS RESPONSE**

Gallatin River Communications L.L.C. d/b/a CenturyLink ("CenturyLink"), by and through its counsel, hereby moves to strike the six new issues NTS Services Corp. ("NTS") has attempted to raise in its response to CenturyLink's petition for arbitration. In support of this motion, CenturyLink states the following:

1. This proceeding is an interconnection arbitration conducted pursuant to Section 252 of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C. §252. The proceeding was initiated on August 3, 2011 when CenturyLink filed its petition for arbitration pursuant to Section 252(b)(1) of the Act. 47 U.S.C. §252(b)(1). Section 252(b)(1) provides:

During the period from the 135th to the 160th day (inclusive) after the date on which an incumbent local exchange carrier receives a request for negotiation under this section, the carrier or any other party to the negotiations may petition a State commission to arbitrate *any open issues*. (emphasis added).

2. In its petition, CenturyLink identified the only two open issues that have not been resolved by the parties. Specifically, the only two open issues are the rates for unbundled DS-0 and DS-1 loops. These two issues are the only unresolved issues remaining from ten issues that remained open as of April 13, 2011. In a letter dated April 13, 2011, Kris Twomey, counsel for NTS, confirmed that the parties had agreed to all the nonprice terms of the interconnection agreement and that only ten pricing issues remained at issue. See Letter of Kris Twomey, attached as Exhibit A. On May 5, 2011, the Parties met in person and telephonically with Commission Staff to discuss the ten issues in an effort to reach a final resolution. The parties subsequently extended the arbitration window and over the next four months conducted numerous telephone calls in order to resolve the ten final pricing issues. All but two of these issues had been resolved by August 3, 2011 when CenturyLink filed its petition. (CenturyLink Petition, ¶11).

3. In its response to CenturyLink's petition, NTS asks the Commission to arbitrate six additional groups of charges. Of the six groups of charges, only the first, tagging and labeling loops, had been a pricing issue identified in Mr. Twomey's April 13, 2011 letter. This issue was subsequently negotiated by the parties and resolved. None of the five remaining groups of charges have ever been open issues in the negotiations between the parties. (Affidavit of Tommy Fields, Attached as Exhibit B, ¶¶4-5). Nor were any of these charges raised as issues in the mediation before Staff. Further, the six issues listed by NTS were not new issues raised by CenturyLink in its petition and NTS does not even claim in its response that these six issues were open issues in the

negotiations. In that response, NTS offers no negotiations background or cost support for its positions on the six issues nor does NTS offer any testimony on the same. Lastly, in its response, NTS did not deny CenturyLink's allegation in its petition that all price items have been agreed to except for the rates for unbundled DS-0 and DS-1 loops.

4. Under the Act, the Commission may only arbitrate "open issues" that have not been resolved through negotiation. *Coserve Limited Liability Corporation v. Southwestern Bell Telephone Company*, 350 F.3d 482 (5th Cir. 2003); 47 U.S.C. §252(b)(1)(authorizing petition to arbitrate "open issues"). The purpose of this requirement is to ensure that the parties identify the issues in dispute and attempt to negotiate them before presenting them to the Commission. The six issues that NTS attempts to raise in its response are not open issues in the negotiations between the parties and are therefore not arbitrable under Section 252 of the Act.

WHEREFORE, Gallatin River Communications L.L.C. d/b/a CenturyLink moves that the Commission strike the six issues that NTS raises in its response to the petition on the grounds that these issues are not “open issues” subject to arbitration under the Act.

Respectfully submitted,

October 3, 2011



Mr. Thomas M. Dethlefs (#6193590)

CenturyLink

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Denver, CO 80202

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(303) 296-3132 (FAX)

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Counsel for GALLATIN RIVER
COMMUNICATIONS L.L.C. D/B/A
CENTURYLINK



April 13, 2011

Via US Mail and Email

Thomas H. Fields, III
Carrier Relations Manager
CenturyLink
100 CenturyLink Dr.
Monroe, LA 71203
Tommy.Fields@CenturyLink.com

Re: Interconnection Agreement Negotiations with NTS

Dear Tommy:

Thank you for providing updates to the template interconnection agreement ("ICA") that we have been negotiating between CenturyLink and NTS. At this point, I believe consensus exists as to the terms and conditions in the ICA. I have spoken with staff at NTS and there is considerable disagreement, however, with the proposed pricing. As the Illinois Commerce Commission has never formally investigated and established CenturyLink or its predecessor's unbundled network element rates, I am assuming that these rates are part of the overall ICA subject to further negotiation. Please advise if CenturyLink's position differs.

NTS will not accept the rates for the following elements. I will address each rate element with NTS' specific concerns and propose an alternative rate. NTS proposes the following rates that are similar to those charged by AT&T in neighboring markets after the ICC analyzed AT&T's most recent UNE pricing schedule.

Service Order Charge- Increased from \$15.25 to \$18.10. The current rate reflects the cost for up to seven orders in a batch. The new proposed rate appears to apply for every individual order. Please confirm. NTS proposes a per order rate of \$2.50.

Band 1 Loop 2W Analog- Increased from \$17.93 to \$32.75. This proposal seeks to nearly double the cost for a standard UNE loop. NTS does not believe a proper TELRIC study can support such a high rate. NTS proposes a rate of \$8.96.

NID Connection –New- Increased from \$0.00 to \$43.69. NTS believes that previously, the NID was always included and not listed as a separate rate element. That practice should continue and the rate should be at \$0.00.

Tag/Label Loop- New- Increased from \$0.00 to \$12.26. The lack of proper loop identification procedures by CenturyLink has been a serious problem for NTS for years. NTS believes that proper engineering and business processes require each company to label its loops and does not agree there should be a charge associated with that practice. As such, NTS suggests a price of \$0.00.

Order Expedite- Increased from \$50.00 to \$150.00. NTS does not agree that any circumstances have changed to support such a large increase. NTS suggest the price remain at \$50.00.

Trip Charges- The current price is \$50.00 and proposed price is reduced to \$25.47 for a standard trip charge. However, separate, new charges have been created for a conditioning engineering charge of \$79.10, and conditioning trip charge of \$25.47. As such, it appears that the rate for a truck roll could increase to as much as \$130.04 depending on the work to be completed. NTS suggests the rate remain at \$50.00 for any trip charge and the additional charges be removed.

Service Order Charges- Increased from \$0.00 to \$16.72 for manual service orders and \$9.25 for electronic service orders. NTS does not believe that creation of such rates is justified and suggests a rate of \$0.00.

Hot Cuts- Increased from \$35.00 to \$83.05. NTS proposes a rate of \$20.00.

DS1 Loop- Decreased from \$170.00 to \$161.00. NTS proposes a rate more in line with that charged by AT&T in neighboring Bartonsville, IL of \$99.00. The proper cost elements of a TELRIC rate for a DS1 in Pekin should not result in a rate \$62.00 higher.

DS1 Interoffice Transport- Although not entirely clear, it appears that the proposed rate will increase from \$170.00 to \$240.00. NTS proposes a rate of \$150.00 reflecting IOT rates in similarly situated rate centers in Illinois.

Load Coil and Bridge Tap Removal- The proposed rate for removal of a load coil(s) is reduced from \$250.00 to \$187.94. It is unclear if this rate applies to removal of all load coils on a loop, or per coil. NTS proposes a rate of \$100.00 for removal of all load coils on a loop. The proposed rate from bridge tap removal increases from \$125.00 to \$187.62. Again, it is unclear if this reflects removal of all bridge taps on a loop, or just one. NTS proposes a rate of \$65.00 for removing all bridge taps on a loop.

As the arbitration window opens on April 22, 2011 and closes May 17, 2011, CenturyLink's prompt attention to this matter would be appreciated. Last week, NTS met with ICC staff raising its ongoing concerns with CenturyLink and specifically regarding the proposed new UNE rates. ICC staff have offered to provide informal mediation prior to the filing of any arbitration case to narrow the issues and perhaps avoid arbitration altogether. NTS is open to this idea. If CenturyLink is as well, please advise as soon as possible so we can schedule the mediation. Please let me know via email or letter CenturyLink's response to the issues raised above.

Sincerely,



Kristopher E. Twomey
Counsel to NTS

STATE OF LOUISIANA)
)
PARISH OF OUACHITA)

AFFIDAVIT OF TOMMY FIELDS

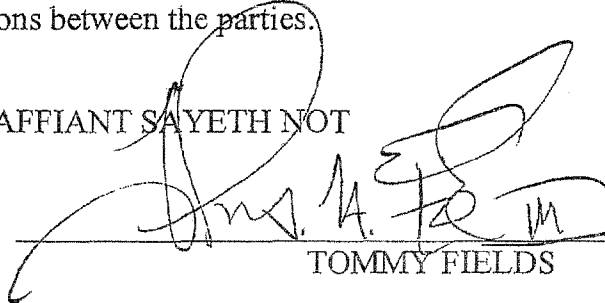
I, Tommy Fields, do on oath depose and state the following:

1. I am a Carrier Relations Manager for CenturyLink. My principal work location is 100 CenturyLink Drive, Monroe, LA 71203. I have been the lead negotiator in the negotiations of an interconnection agreement with NTS Services Corp. ("NTS").
2. On February 2, 2011, I sent an email to Kris Twomey, counsel for NTS, containing CenturyLink's proposed pricing for various recurring and nonrecurring charges. A copy of the email is attached. On April 13, 2011, Mr. Twomey responded with a letter in which he identified the ten pricing issues that NTS disagreed with. A Copy of Mr. Twomey's letter is attached in Exhibit B to CenturyLink's petition for arbitration.
3. During the next four months, we conducted numerous negotiation sessions in an effort to resolve the ten pricing issues NTS identified as open issues. Ultimately, we reached agreement on all but two of the issues – the rates for DS-O and DS-1 unbundled loops.
4. I have reviewed NTS's response to CenturyLink's petition for arbitration. On pages 6 and 7 of the response, NTS identifies six groups of charges that NTS

seeks to arbitrate. The first issue ("tagging and labeling loops") was one of the ten issues NTS identified in its April 13, 2011 letter. The parties negotiated this rate and NTS agreed to CenturyLink's proposed charge.

5. The five remaining groups of charges included in NTS's response had all been identified to NTS in the price list sent to NTS on February 2, 2011. At no time did NTS raise any of these charges as issues in negotiations between the parties. None of these charges were presented as new charges in CenturyLink's petition for arbitration. None of these charges were open issues in the negotiations between the parties.

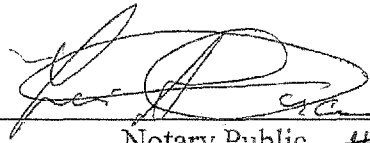
FURTHER AFFIANT SAYETH NOT



TOMMY FIELDS

SIGNED AND SWORN TO BEFORE ME THIS 30th day of

September, 2011, at Monroe, Louisiana.



Notary Public # 46750

My Commission expires:

At my DEATH

Dethlefs, Thomas

From: Fields, Tommy [Tommy.Fields@CenturyLink.com]
Sent: Wednesday, February 02, 2011 8:59 AM
To: 'Kristopher Twomey'
Cc: Green, Matt O; Miller, Guy
Subject: RE: BFR for Negotiations of Inconnection Agreement / RE: NTS ICA redlines
Attachments: IL Price Sheet - 2010.xlsb

Good morning, Kris:

Just checking to see if you and the NTS team had an opportunity to complete your review of the ICA template?

If so, please send your comments at your earliest convenience so we can reschedule the meeting as well.

Also, attached please find the new pricing/rate schedules for Illinois for your review. The collocation rates were previously sent separately, but let me know if you don't have them and I'll resend.

If you have any questions, or if I can be of any further assistance, please don't hesitate to contact me.

Regards,

Tommy

-----Original Message-----

From: Fields, Tommy
Sent: Friday, January 21, 2011 3:41 PM
To: 'Kristopher Twomey'
Cc: Green, Matt; Miller, Guy
Subject: RE: BFR for Negotiations of Inconnection Agreement / RE: NTS ICA redlines

Thanks for the status update, Kris, no problem.

Let me know and I'll send another meeting notice to reschedule.

Have a great weekend,

Tommy

-----Original Message-----

From: Kristopher Twomey [mailto:kris@lokt.net]
Sent: Friday, January 21, 2011 3:32 PM
To: Fields, Tommy
Cc: Green, Matt; Miller, Guy
Subject: RE: BFR for Negotiations of Inconnection Agreement / RE: NTS ICA redlines

Hey guys, we haven't been able to complete the review of the ICA yet. I'll be back in touch next week after we're done and then we can set up another time to talk. I'd like to give you time to review our comments before the call occurs as well.

Kris
202.250.3413

KEY CODES		CENTURYLINK	CT-ILLINOIS		
MRC	NRC				
		RESALE DISCOUNTS		MRC	NRC
		Other than Operator / DA		TBD	
		Op Assist / DA		TBD	
		USAGE FILE CHARGES		MRC	NRC
		Message Provisioning, per message		\$0.000684	
		Data Transmission, per message		\$0.000000	
		Media Charge - per CD (Price reflects shipping via regular U.S. Mail)			\$18.00
		OTHER CHARGES		MRC	NRC
		Temporary Suspension of Service for Resale - SUSPEND			\$0.00
		Temporary Suspension of Service for Resale - RESTORE			\$21.00
		PIC Change Charge, per change			Per Tariff
		Operator Assistance / Directory Assistance Branding			ICB
		UNE LOOP, TAG & LABEL / RESALE TAG & LABEL		MRC	NRC
I0005		Tag and Label on a reinstall loop or an existing loop or resale			\$12.26
		TRIP CHARGE		MRC	NRC
I0007		Trip Charge			\$25.47
		RATE ELEMENT			
		SERVICE ORDER / INSTALLATION / REPAIR		MRC	NRC
I0008		Manual Service Order NRC			\$16.72
I0009		Manual Service Order - Listing Only			\$16.72
I0010		Manual Service Order - Change Only			\$16.72
I0011		Electronic Service Order (IRES)			\$9.25
I0012		Electronic Service Order - Listing Only			\$9.25
I0013		Electronic Service Order - Change Only			\$9.25
I0014		2-Wire Loop Cooperative Testing			\$53.66
I0015		4-Wire Loop Cooperative Testing			\$65.92
I0016		Trouble Isolation Charge			\$68.76
		LNP Coordinated Conversion - Lines 1 - 10			\$83.05
		LNP Coordinated Conversion - Each additional line			TBD
		LNP Conversion - 10 Digit Trigger			\$0.00
		UNE to Special Access or Special Access to UNE Conversions or Migrations (includes EEL)			
I0018		DS1 Loop, per circuit			TBD
I0019		DS1 Transport, per circuit			TBD
		DS3 Loop, per circuit			ICB
		DS3 Transport, per circuit			ICB
		UNBUNDLED NETWORK ELEMENTS (UNE)			
		PRE-ORDER LOOP QUALIFICATION		MRC	NRC
		Loop Make-Up Information			\$11.30
		LOOPS (RATES INCLUDE NID CHARGE)		MRC	NRC
		2-Wire Analog			
I0020		Band 1		\$32.75	
I0021		Band 2		\$65.85	
I0022		Band 3		\$134.31	
I0023		Band 4			
	I0027	First Line			\$108.71
	I0028	Second Line and Each Additional Line (same time)			\$30.88
	I0029	Re-install (Cut Thru and Dedicated/Vacant)			\$51.83
	I0030	Disconnect			\$57.24
		4-Wire Analog			
I0031		Band 1		\$72.96	
I0032		Band 2		\$126.78	
I0033		Band 3		\$237.48	
I0034		Band 4			
	I0038	First Line			\$130.36
	I0039	Second Line and Each Additional Line (same time)			\$52.53
	I0040	Re-install (Cut Thru and Dedicated/Vacant)			\$70.73
	I0041	Disconnect			\$57.24

KEY CODES		CENTURYLINK	CT-ILLINOIS		
MRC	NRC				
		2-Wire xDSL - Capable Loop			
I0042		Band 1	\$32.75		
I0043		Band 2	\$65.85		
I0044		Band 3	\$134.31		
I0045		Band 4			
	I0049	First Line			\$111.29
	I0050	Second Line and Each Additional Line (same time)			\$33.45
	I0051	Re-install (Cut Thru and Dedicated/Vacant)			\$51.83
	I0052	Disconnect			\$57.24
		2-Wire Digital Loop			
I0064		Band 1	\$32.75		
I0065		Band 2	\$65.85		
I0066		Band 3	\$134.31		
I0067		Band 4			
	I0071	First Line			\$111.29
	I0072	Second Line and Each Additional Line (same time)			\$33.45
	I0073	Disconnect			\$57.24
		2-Wire ISDN-BRI Digital Loop			
I0074		Band 1	\$41.71		
I0075		Band 2	\$96.61		
I0076		Band 3	\$205.57		
I0077		Band 4			
	I0081	First Line			\$111.29
	I0082	Second Line and Each Additional Line (same time)			\$33.45
	I0083	Disconnect			\$57.24
		Digital 56k/64k Loop			
I0094		Band 1	\$60.90		
I0095		Band 2	\$82.21		
I0096		Band 3	\$382.51		
I0097		Band 4			
	I0101	First Line			\$262.76
	I0102	Second Line and Each Additional Line (same time)			\$184.93
	I0103	Disconnect			\$57.24
		DS1 Service			
I0104		Band 1	\$161.00		
I0105		Band 2	\$372.63		
I0106		Band 3	\$812.32		
I0107		Band 4			
	I0111	First Line			\$363.79
	I0112	Second Line and Each Additional Line (same time)			\$285.96
	I0113	Disconnect			\$57.24
		DS3 Service			
		Add DS3 to existing fiber system	ICB		\$143.31
		Disconnect			\$24.42
		LOOP CONDITIONING			
			MRC		NRC
		Load Coil Removal for all Digital UNE and xDSL-Capable loops that are less than 18,000 feet in length - per line conditioned (No Engineering or Trip charges - price reflects 25 pair economies)			TBD
	I0219	Conditioning Engineering Charge - per loop			\$79.10
	I0220	Conditioning Trip Charge - per loop			TBD
		The following charges apply to all loops of any length that require Bridged Tap or Repeater removal.			
		Load Coil Removal: Loops 18kft or longer			
	I0221	Unload cable pair, per Underground location			\$187.62
	I0222	Unload Add'l cable pair, UG same time, same location and cable			\$1.14
	I0223	Unload cable pair, per Aerial Location			\$77.60
	I0224	Unload Add'l cable pair, AE or BU, same time, location and cable			\$1.14
	I0225	Unload cable pair, per Buried Location			\$110.17

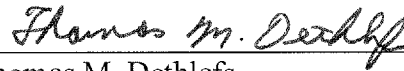
KEY CODES		CENTURYLINK	CT-ILLINOIS		
MRC	NRC				
		Bridged Tap or Repeater Removal - Any Loop Length			
	I0232	Remove Bridged Tap or Repeater, per Underground Location			\$187.94
	I0226	Remove each Add'l Bridged Tap or Repeater, UG same time, location and cable			\$1.45
	I0227	Remove Bridged Tap or Repeater, per Aerial Location			\$77.91
	I0228	Remove each Add'l Bridged Tap or Repeater, AE or BU same time, location and cable			\$1.45
	I0231	Remove Bridged Tap or Repeater, per Buried Location			\$110.49
		SUB LOOPS (RATES INCLUDE NID CHARGE)		MRC	NRC
		Sub-Loops Interconnection (Stub Cable)			ICB
		2 Wire Voice Grade and Digital Data Distribution			
I0114		Band 1		\$19.77	
I0115		Band 2		\$35.42	
I0116		Band 3		\$68.13	
I0117		Band 4			
	I0121	First Line			\$113.56
	I0122	Second Line and Each Additional Line (same time)			\$35.73
	I0123	Disconnect			\$60.53
		DEDICATED INTEROFFICE TRANSPORT		MRC	NRC
	DWA00	DS1		Refer to Dedicated Transport Tab	\$101.63
		DS1 Disconnect			\$24.42
	DWA01	DS3		Refer to Dedicated Transport Tab	\$101.63
		DS3 Disconnect			\$24.42
		MULTIPLEXING		MRC	NRC
		Multiplexing elements are only relevant in conjunction with UNE transport.			
I0134	I0135	Multiplexing - DS1-DS0 (per DS1) - (Shelf only, rate does not include cards)		TBD	\$101.63
		DS1-DS0 Disconnect			\$24.42
I0136	I0137	Multiplexing - DS3-DS1 (per DS3)		TBD	\$101.63
		DS3-DS1 Disconnect			\$24.42
		UNBUNDLED DARK FIBER TRANSPORT		MRC	NRC
		Dark Fiber Application & Quote Preparation Charge			\$299.90
		Note: These elements are calculated and billed manually using one price per USOC and COS. Detail is provided by the DFA form returned to the customer.			
		Transport			
		Interoffice, per foot per fiber - Statewide Average		TBD	
		Additional Charges Applicable to Transport			
		Fiber Patch Cord, per fiber		TBD	
		Fiber Patch Panel, per fiber		TBD	
		Central Office Interconnection, 1-4 Patch Cords per CO - Install or Disconnect			\$252.23
		Dark Fiber End-to-End Testing, Initial Strand			\$87.71
		Dark Fiber End-to-End Testing, Subsequent Strand			\$24.51
		EEL COMBINATIONS		MRC	NRC
		Enhanced Extended Link (EEL) is a combination of Loop, Transport and Multiplexing (when applicable). Refer to the specific UNE section (transport, loop, multiplexing) in this document to obtain pricing for each specific element.			
		See Rate Element / Service Order / Installation/Repair Center section of this price sheet for EEL Conversion Charges.			
		RECIPROCAL COMPENSATION		MRC	NRC
		End Office - per MOU		TBD	N/A
		Tandem Switching - per MOU		TBD	N/A
		Shared Transport - per MOU		TBD	N/A

KEY CODES		CENTURYLINK	CT-ILLINOIS		
MRC	NRC				
		TRANSIT SERVICE		MRC	NRC
		Transit Service Charge - per MOU		TBD	
		DATABASE		MRC	NRC
		Local Number Portability query (LNP)		Per interstate tariff	Per interstate tariff
		Toll Free Code query (TFC) - Simple		Per interstate tariff	Per interstate tariff
		Toll Free Code query (TFC) - Complex Additive		Per interstate tariff	Per interstate tariff
		Line Information Database query (LIDB)		Per interstate tariff	Per interstate tariff
		Line Information Database query transport (LIDB)		Per interstate tariff	Per interstate tariff
		DIRECTORY SERVICES		MRC	NRC
		Directory - Premium & Privacy Listings		Refer to Applicable Retail Tariff	
		Directory Listings - (if CLEC not purchasing UNE Loops or Resale Services)		TBD	
		911 AND E911 TRANSPORT AND TERMINATION		MRC	NRC
		911 and E911 Transport - DS1		Refer to Applicable Access Tariff	Refer to Applicable Access Tariff
		Multiplexing - DS1-DS0 (per DS1) - (Shelf only, rate does not include cards)		Refer to Applicable Access Tariff	Refer to Applicable Access Tariff
I0233	I0234	DS0 911 Per Port (minimum of 2 DS0's required)		TBD	\$262.76
		STREET INDEX GUIDE		MRC	NRC
I0001		SIG Database Extract Report, per CDROM (price reflects shipping regular U.S. Mail)		\$18.00	
		ROUTINE MODIFICATION OF FACILITIES		MRC	NRC
		Rearrangement of Cable			
		Rearrangement of Up to 3 Pairs per UNE Loop Ordered		N/A	Included in Loop NRC
		Rearrangements Requiring More Than 3 Pairs per UNE Loop Ordered		N/A	ICB
		Repeater/Doubler Installation Cost (incl. 4 slot housing and 1 card), per location			
		1. Repeater Equipment Case w/ Repeater Card (for T-1 applications):			
		Where Special Construction Does Not Apply (Card Installation Only)		Included in Loop MRC	Included in Loop NRC
I0229		Where Special Construction Applies, Non Recurring Charge			TBD
		2. Doubler Equipment Case w/ Doubler Card (for HDSL applications)			
		Where Special Construction Does Not Apply (Card Installation Only)		Included in Loop MRC	Included in Loop NRC
I0230		Where Special Construction Applies, Non Recurring Charge			TBD
		Smart Jack		Included in Loop MRC	Included in Loop NRC
		Line Card Installation		Included in Loop MRC	Included in Loop NRC
		Multiplexing		Included in Loop MRC	Included in Loop NRC
		Note: Multiplexer pricing available through Enhanced Extended Loop (EELs) facility leases			

CERTIFICATE OF SERVICE

The undersigned attorney for Gallatin River Communications, L.L.C. d/b/a CenturyLink hereby certifies that the caused copies of the attached Gallatin River Communications L.L.C. d/b/a CenturyLink's Motion to Strike Issues Raised in NTS Response to be served on the persons listed below in the matter indicated:

syoder@icc.illinois.gov
mlannon@icc.illinois.gov
mcnamara.evans@gmail.com
jolivero@icc.illinois.gov
kris@lokt.net
jzolnier@icc.illinois.gov



Thomas M. Dethlefs

Counsel for Gallatin River Communications L.L.C.
d/b/a CenturyLink